

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

BRADLEY CLONAN, Plaintiff v. CentraState Healthcare System/Atlantic Health System; RWJBarnabas Health – Monmouth Medical Center; Hampton Behavioral Health Center, et al. Defendants.	Civil Docket No.: 3:24-cv-11399-RK-RLS
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**CROSS-MOTION TO STAY DISCOVERY ON BEHALF OF DEFENDANT HAMPTON
BEHAVIORAL HEALTH CENTER**

PLEASE TAKE NOTICE THAT on July 7, 2025 at 9:00 a.m. or as soon thereafter as counsel may be heard, Defendant Hampton Behavioral Health Center (“Defendant”) will move before the Honorable Robert Kirsch, U.S.D.J., of the United States District Court for the District of New Jersey, for an Order, pursuant to L.Civ.R. 7.1(h) and Fed.R.Civ.P. 26(c)(1), staying discovery in this matter.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendant relies upon the Memorandum of Law, which is incorporated herein by reference. For all of the reasons set forth in the accompanying Memorandum of Law, Defendant requests that this Court grant the Cross-Motion to stay discovery.

PLEASE TAKE FURTHER NOTICE that this motion will be decided on the papers unless otherwise notified by the Court.

A proposed form of Order accompanies this motion.

Respectfully submitted,

Date: June 23, 2025

By: /s/ Michael W. Bootier

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CERTIFICATE OF SERVICE

I, Michael W. Bootier, Esquire hereby certifies that a true and correct copy of the foregoing Cross-Motion to Stay Discovery and Opposition to Plaintiff's Motion to Compel Discovery was served via this Court's electronic filing system upon the following on June 23, 2025:

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Respectfully submitted,

Date: June 23, 2025

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